

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

	X	
	:	Chapter 11
In re:	:	
	:	Case No. 08-13555 (SCC)
LEHMAN BROTHERS HOLDINGS INC., <i>et al.</i> ,	:	
	:	
Debtors.	:	
	X	
LEHMAN BROTHERS SPECIAL FINANCING INC.,	:	
	:	
Plaintiff,	:	
	:	
-against-	:	Adversary Proceeding
	:	No. 10-03547 (SCC)
BANK OF AMERICA NATIONAL ASSOCIATION,	:	
<i>et al.</i> ,	:	
Defendants.	:	
	X	
SHIELD SECURITIES LIMITED,	:	Case No. 15-08052 (ALC)
	:	
Appellant,	:	On Appeal from the United
	:	States Bankruptcy Court
-against-	:	for the Southern District of
	:	New York, Honorable
LEHMAN BROTHERS SPECIAL FINANCING INC.,	:	Shelley C. Chapman,
	:	Adv. Pro. No. 10-03547
Appellee.	:	
	X	

**DECLARATION OF WILLIAM F. DAHILL IN OPPOSITION  
TO SHIELD SECURITIES LIMITED’S MOTION FOR LEAVE TO  
APPEAL FROM THE BANKRUPTCY COURT’S ORDER CONCERNING  
SHIELD’S MOTION TO DISMISS FOR LACK OF PERSONAL JURISDICTION**

WILLIAM F. DAHILL, an attorney duly admitted to the practice of law, under penalty of perjury, hereby affirms:

1. I am a Partner of Wollmuth Maher & Deutsch LLP, attorneys for Lehman Brothers Special Financing Inc. (“LBSF”) in this action. I am familiar with the facts set forth

herein on the basis of my personal knowledge and review of documents in the possession of my firm.

2. I submit this declaration in opposition to Shield Securities Limited's ("Shield") Motion for Leave to Appeal from the Bankruptcy Court's Order Concerning Shield's Motion to Dismiss for Lack of Personal Jurisdiction.

3. There are 45 CDOs remaining in the adversary proceeding entitled *Lehman Brothers Special Financing Inc. v. Bank of America National Association*, Adversary Proceeding No. 10-03547, against the noteholder defendants. Three of those CDOs are governed by English law, while the remaining 42 CDOs are governed by United States law. The Series 2007-1 U.S.D. 40,000,000 Credit Linked Synthetic Portfolio Notes due 2014 (the "Ruby Notes") are one of the three CDOs governed by English law.

4. Shield was the sole noteholder for the Ruby Notes.

5. After the first scheduling order was entered on July 12, 2014 (Doc. No. 794)<sup>1</sup> allowing for individual defendants to make a Letter Request for permission to move to dismiss based on personalized and unique defenses, Shield, ANZ Nominees Limited ("ANZ Nominees") and Clearstream Banking, S.A. ("Clearstream") sought to move to dismiss for lack of personal jurisdiction. No other defendants made Letter Requests to move to dismiss for lack of personal jurisdiction.

6. After reaching a settlement with Clearstream, LBSF voluntarily dismissed Clearstream from the adversary proceeding on June 12, 2014. Doc. No. 113. Clearstream was dismissed before its motion to dismiss was fully briefed.

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<sup>1</sup> Filings in the underlying adversary proceeding are identified herein by their ECF document number as "Doc. No. \_\_\_\_."

7. ANZ Nominees' motion to dismiss is the only pending motion to dismiss for lack of personal jurisdiction remaining in the adversary proceeding.

Dated: New York, New York  
October 26, 2015

/s/ William F. Dahill

William F. Dahill